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November 15, 2017

**Via ECF**

The Honorable Joanna Seybert  
United States District Court  
Eastern District of New York  
944 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Jack Vitayanon  
Criminal Docket No. 17-080 (JS)

Dear Judge Seybert:

We represent Jack Vitayanon, the defendant in the above referenced case. As the Court is aware, Mr. Vitayanon is currently undergoing in-patient drug treatment at Integrity House, located in Newark, New Jersey. I am writing to respectfully request that Mr. Vitayanon be granted leave to utilize of a twenty-four hour pass offered to him by Integrity House. The pass is proposed for tomorrow, November 16, 2017.

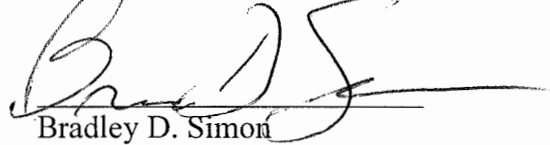
Integrity House offers eligible patients the ability to spend twenty-four hours (from 9 a.m. through 9 a.m.) off-site from its in-patient facility. Integrity House issues these passes for a limited set of dates. Mr. Vitayanon has qualified for such a one-day pass tomorrow.

U.S. Pretrial services officer Brian Manganaro has advised me that he has no objection to Mr. Vitayanon receiving a pass so long as his itinerary for the day is provided. I am hereby attaching Mr. Vitayanon's proposed itinerary. As set forth in the itinerary, Mr. Vitayanon will be calling into Integrity House every four hours. Mr. Vitayanon's mother, Kay Vitayanon, who has attended court conferences and been very supportive of her son's efforts to get treatment, will be responsible for furnishing his transportation.

Accordingly, it is respectfully requested that Your Honor grant Mr. Vitayanon's request to receive a twenty-four hour day pass from Integrity House.

Finally, I apologize for the short notice of this request. It only recently came to my attention that this opportunity was possible for Mr. Vitayanon.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Bradley D. Simon', written over a horizontal line.

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Enc.

## **24-Hour Pass Itinerary on 11/16/17 for Jack V. (STR: Emanuel R.)**

9:00 a.m.: Leave Integrity House to travel to travel to parents' house  
233 Rossiter Ave., in Paterson, NJ.

10:00 a.m.: Spending time with family.

11:00 a.m.: Spending time with family.

12:00 p.m.: Spending time with family.

1:00 p.m.: Spending time with family. **Call to check in at Integrity House.**

2:00 p.m.: Travel to and shopping at Route 46 Plaza, in Little Falls, NJ.

3:00 p.m.: Travel to and shopping at Willowbrook Mall in Wayne, NJ.

4:00 p.m.: Shopping at Willowbrook Mall in Wayne, NJ.

5:00 p.m.: Shopping at Willowbrook Mall in Wayne, NJ.  
**Call to check in at Integrity House.**

6:00 p.m.: Return to parents' house – Paterson, NJ.

7:00 p.m.: Spending time with family.

8:00 p.m.: Attend N.A. Meeting at Eva's Village in Paterson, NJ.

9:00 p.m.: Return to parents' house in Paterson, NJ.  
**Call to check in at Integrity House.**

10:00 p.m.: Go to sleep.

11:00 p.m.: Sleep.

12:00 a.m.: Sleep.

1:00 a.m.: Sleep.

2:00 a.m.: Sleep.

3:00 a.m.: Sleep.

4:00 a.m.: Sleep.

5:00 a.m.: Sleep.

6:00 a.m.: Sleep.

7:00 a.m.: Wake up.

8:00 a.m.: Travel from Paterson, NJ to Integrity House.

9:00 a.m.: Arrive back at Integrity House.